Supreme Court, U.S.
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No.

In the

Supreme Court of the United States

Pearl Moody,

Petitioner,

v.

United States Secretary of the Army,

Respondent

On Petition of Writ of Certiorari
to the United States Court of Appeals for the Fifth Circuit

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. What is the appropriate framework to establish a prima facie case of disparate treatment in an Age Discrimination in Employment Act claim?

2. Is there an exhaustion requirement when a claimant seeking a remedy under the Age Discrimination in Employment Act seeks an administrative remedy?

PARTIES TO THE PROCEEDING

1. Pearl Moody, petitioner
2. Acting United States Secretary of the Army, Les Brownlee, respondent
3. United States Department of Justice

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OPINIONS BELOW

DISTRICT COURT
United States District Court
for the Western District of Louisiana
Pearl Moody v. Thomas E. White, Secretary of the Army
No. 2:01 CV 0111

APPELLATE COURT
Pearl Moody v. United States Secretary of the Army
No. 02-31208 (5th Cir. August 21, 2003)

STATEMENT OF JURISDICTION

The decision and opinion of the United States Court of Appeals for the Fifth Circuit was issued and filed on August 21, 2003. This Petition for Writ of Certiorari is filed within 90 days after the filing of that opinion and decision. The United States Supreme Court's jurisdiction is invoked pursuant to 28 United States Code § 1254(1) providing in pertinent part that,

> Cases in the courts of appeals may be reviewed by the Supreme Court by the following methods:
>
> (1) By writ of certiorari granted upon the petition of any party to any civil or criminal case, before or after rendition of judgment or decree;

STATUTES INVOLVED

29 U.S.C. §§ 621.....4, 6

29 U.S.C. § 623.....7

29 U.S.C. § 633.....15

See Appendix For Text of Statutes Involved

STATEMENT OF THE CASE

While working for the United States Army under the supervision of Ellis Smith at Fort Polk, Louisiana, and then age 61, the petitioner, Pearl Moody, was subjected to age discrimination resulting in a failure to promote her despite her qualifications. These qualifications were apparent as Ms. Moody accomplished higher level tasks, all the time requesting a promotion. TR. 171-174. The Army also subjected Ms. Moody to a hostile work environment, as she had to regularly endure Mr. Smith's offensive statements such as "granny, have you not got anything to do," "see that old woman and she will take care of you," and "old woman, when are you going to retire and go home so someone younger can have a job." TR. 177. Mr. Smith's continued harassment, which caused an offensive work environment and included a deceptive scheme to deny Ms. Moody deserved promotions, is in direct violation of the Age Discrimination in Employment Act (ADEA); 29 U.S.C. §§ 621-633.

The District Court, Western District of Louisiana, initially denied the respondent's motion for summary judgment. However, on September 18, 2002, the District Court granted that motion based on the opinion that Pearl Moody failed to exhaust her administrative remedy. A motion to amend the judgment was filed on October 2, 2002 and a memorandum ruling denying the motion to amend the judgment was entered on November 14, 2002. Pearl Moody filed notice of appeal on November 25, 2002. The Court of Appeals for the United States Fifth Circuit, on August 21, 2003, affirmed the district court's grant of summary judgment in favor of the respondent based on the opinion that Ms. Moody failed to establish a prima facie case for age discrimination.

Pearl Moody has been a civilian employee of the Army for over 23 years. At the beginning of her employment in 1980, Ms. Moody was an hourly wage non-appropriated employee. In two years she went from a non-appropriated position to a Government Service (GS)-4 permanent position. In 1985 Ms. Moody was promoted to a GS-5 position. In 1987 she was assigned to the real estate department as a real property clerk, 303 series. The petitioner currently works in the same department as a real property technician in the 1101 series. At present, she is a GS-5, Step 10. Ms. Moody is at the ceiling of her classification because Step 10 is the highest level that a GS-5 may achieve. Despite the fact that Ms. Moody has never received any poor performance evaluations, the last time that the petitioner received a pay increase was several years ago when she acquired the Step 10 status. Thus, in order to obtain an increase in pay, Ms. Moody must be promoted.

Despite the fact that Pearl Moody is only a GS-5, she has been assigned and performed tasks equivalent to the duties of employees at the GS-9 through GS-12 levels. TR. 171-174. Such tasks include performing surveys, boundaries, encroachments, and estimates of new buildings. TR. 171-174. The aforementioned tasks were assigned to Ms. Moody by Ellis Smith, the supervisor who subjected Ms. Moody to the discriminatory acts. Over a period of years Mr. Smith not only referred to Ms. Moody as "granny" and "old woman," but has also made remarks encouraging her to "go home and garden," "bake cookies" and "go fishing." TR. 177. Moreover, Mr. Smith has told Ms. Moody to "retire so that someone younger may have a job." TR. 177. These comments came in the presence of other employees and people in the military who happened to be in the office at the time that the comments were made. TR. 171-174, 177, 178.

Despite such discriminatory treatment Pearl Moody repeatedly sought to be promoted. In February 1995, Mr. Smith allegedly encouraged Ms. Moody to apply for a position for which she was qualified. The position would place her in a GS-7 position with training to become a GS-9. However, Mr. Smith changed the job description during the application process which resulted in Ms. Moody being ineligible for the position. The changed position was given to a much younger employee. TR. 171-174.

Because of the ongoing ageist remarks made by her supervisor, and his failure to promote, Pearl Moody made numerous visits to the Fork Polk Equal Employment Opportunity Office. Her continued visits led to numerous counseling sessions with EEO counselor, Barbara Warren, and the eventual filing of a complaint. Ultimately there was a mediation session between petitioner and Mr. Smith with Jim Kelly, who at that time served as the acting director for the Department of Public Works. The result of the mediation session was a Negotiated Settlement Agreement (NSA). TR. 168-170. However, the Army failed to meet certain terms of the NSA, frustrating Ms. Moody who was forced to seek redress through the judicial system. The federal district court concluded that both parties breached the terms of the NSA rendering the NSA void. In any event, after the non-adherence of the NSA, Ms. Moody decided to contact the EEOC to report the lack of compliance. Shortly thereafter, Ms. Moody received her right to sue letter from the EEOC and commenced this civil action.

ARGUMENT

The purpose of the ADEA is, in part, to "promote employment of older persons based on their ability rather than age; to prohibit arbitrary age discrimination in employment...." 29 U.S.C. § 621(b). In keeping with this

purpose employers may not discriminate against an employee because of his age in regard to "...compensation, terms, conditions, or privileges of employment...." 29 U.S.C. § 623(a)(1).

Unlike employment discrimination claims under Title VII, the ADEA allows a victim of age discrimination the option of either seeking relief through an administrative remedy or through the federal court system. Courts have relied on the *McDonnell Douglas* analysis for ADEA claims when disparate treatment is to be proved using circumstantial evidence. *McDonnell Douglas Corporation v. Green*, 411 U.S. 792, 93 S.Ct. 1817, 36 L. Ed. 2d 668 (1973). It is not clear, however, whether the *McDonnell Douglas* analysis is the appropriate framework. Moreover, if *McDonnell Douglas* is the appropriate framework, it is not clear what elements are necessary to establish a prima facie case when an employer has failed to promote and the individual is subjected to a hostile working environment. In addition, there is a lack of consistency within the federal court system as to whether the option of using either an administrative remedy, or seeking relief directly through the federal court system, means that one still must exhaust the administrative remedy since the employee has the choice of either seeking relief through federal court without seeking the administrative remedy as a prerequisite.

In Pearl Moody's case the Fifth Circuit affirmed the District Court's grant of summary judgment based on its opinion that Ms. Moody failed to demonstrate a prima facie case of age discrimination. The District Court dismissed Ms. Moody's claims for failure to exhaust administrative remedies. Thus, two issues are of concern in determining the grant of summary judgment by the lower courts. One is the failure to make out a prima facie case of age discrimination. The other is the failure to exhaust administrative remedies.

The discord among the circuits regarding what is necessary to make out a prima facie case in federal ADEA claims has yet to be settled by this Honorable Court. Moreover, there is a lack of clarity on whether there is a need to exhaust administrative remedies in age discrimination cases. Due to these significant discrepancies the petitioner respectfully entreats this court to grant this petition for Writ of Certiorari.

I. Appropriate framework to establish a prima facie case

According to *McDonnell Douglas*, supra, at 411 U.S. 802, in order to establish a prima facie case of disparate treatment in a Title VII claim, the complainant must prove: (1) that the plaintiff belongs to a protected class; (2) that he applied and was qualified for a job for which the employer was seeking applicants; (3) that, despite his qualifications, he was rejected; and (4) that, after his rejection, the position remained open and the employer continued to seek applicants with similar qualifications. *McDonnell Douglas*, supra, at 411 U.S. 802. Although the United States Supreme Court has never stated that the *McDonnell Douglas* framework is the appropriate framework to be used in ADEA claims, it has been assumed to be appropriate. See, *O'Connor v. Consolidated Coin Caterers Corporation*, 517 U.S. 308, 116 S. Ct. 1307, 134 L. Ed. 2d 433 (1996).

Using the *McDonnell Douglas* framework the Tenth Circuit, in *Coe v. Yellow Freight System, Inc.*, 646 F.2d 444 (10th Cir. 1981), declared that, to establish a prima facie case of discrimination resulting in a failure to promote, the plaintiff must establish: "(1) he applied for an available position; (2) he was qualified for the position; and (3) he was rejected under circumstances which gave rise to an inference of unlawful discrimination...." *Coe*, supra, at 448-449. Pearl

Moody met each element necessary to establish a prima facie case by the Tenth Circuit standard. Ms. Moody's vast experience qualified her for the position of Engineer Tech 07 for which she applied. TR. 171-174. However, during the course of the application process the job description was changed by the same supervisor who admitted to making discriminatory age related comments toward and about Ms. Moody. TR. 171-174, 177. The facts presented in this case clearly give rise to an inference of unlawful discrimination. *Id. Reeves v. Sanderson Plumbing Products, Inc.*, 530 U.S. 133, 120 S.Ct. 2097, 147 L. Ed. 2d 105 (2000).

In another decision the Tenth Circuit inferred that proof that one sought a position would be sufficient to establish a prima facie case. *Garcia v. Pueblo Country Club*, 299 F.3d 1233 (10th Cir. 2002). In particular, the appellate court wrote, "to establish a prima facie case for failure to promote, plaintiff must show...that *she applied for—or at least sought*—the position at issue." *Id.*, at 1238. There is a significant difference between applying for a position and seeking a position. According to *Webster's Third New International Dictionary,* "apply" in the context of employment means to make an appeal or a request formally and often in writing, whereas "seek" means to go in search of, to look for, or to try to discover. *Webster's Third New International Dictionary*, pgs. 105, 2055, Springfield, MA, Merriam-Webster, Inc., (1986). The *Black's Law Dictionary* defines "apply" in a similar manner, to make a formal request or motion. *Black's Law Dictionary* 101, pg. 96, (Bryan A. Garner ed., 7th ed., West 1999). Thus, in regard to Pearl Moody, even if she is found to have not applied for the position that was changed in February 1995, she definitely sought out positions to advance her employment status and would have established a prima facie case in the Tenth Circuit according to this opinion authored by Circuit Judge Henry. This discrepancy should be addressed.

Not only is there a difference in what must be proven to establish a prima facie case of age discrimination, there are also differences among the circuits as to how strict the courts will be in proving the elements of a prima facie case. The Third Circuit in *Torre v. Casio, Inc.*, 42 F.3d 825 (3d Cir. 1994), determined that the prima facie elements are flexible. In *Torre*, an employer over the age of forty was transferred, then terminated, during a reduction in force. The court of appeals held that, even without evidence of a replacement, a prima facie case was nonetheless established. The Third Circuit, via Circuit Judge Lewis, wrote, "the nature of the required showing to establish a prima facie case of disparate treatment...depends on the circumstances of the case." *Torre*, supra, at 831, citing *Massarsky v. General Motors Corp.*, 706 F.2d 111, 118. The court of appeals reasoned that "while we noted in [*Gray v. York Newspapers, Inc.*, 957 F.2d 1070, 1078 (3d Cir. 1992)] that an ADEA plaintiff *may* establish [her] prima facie case by meeting the four criteria announced there, we did not conclude that those elements were inflexible." *Torre*, supra, at 831. The court concluded that it was appropriate to reformulate the fourth element due to the circumstances of that case. The court of appeals in *Torre* noted that "the inference of age discrimination may not be overpowering, but we cannot say that, as a matter of law, it is insufficient." *Torre*, supra at 832.

The Sixth Circuit also has adjusted the elements necessary to establish a prima facie case under the *McDonnell Douglas* framework. In *Sunstrom v. Schering-Plough Corporation*, 856 F.Supp. 1265 (E.D. Tenn. 1994), a sales representative brought an ADEA action against her employer. The District Court for the Eastern District of Tennessee dismissed plaintiff's claim, holding in part that there was not enough proof to support her ADEA claim. The court through Chief Judge Jarvis noted, "the United States

Court of Appeals for the Sixth Circuit has rejected strict adherence to the *McDonnell Douglas* criteria and has noted problems associated with the mechanistic application of it: A mechanical application of the *McDonnell Douglas* guidelines might bar the suit of a worthy ADEA claimant." *Sunstrom*, supra at 1271. Consequently, if Pearl Moody had brought her claim in the Sixth Circuit, it seems likely that she would have realized her day in court.

The First Circuit also uses the *McDonnell Douglas* analysis in ADEA claims. The elements necessary to establish an ADEA prima facie case are: (1) the plaintiff must be in a protected class; (2) the plaintiff must meet the employer's legitimate performance expectations; (3) the plaintiff must be adversely affected; and (4) the plaintiff was replaced by another with similar skills and qualifications. *Mulero-Rodriguez v. Ponte, Inc.*, 98 F.3d 670, 673 (1st Cir. 1996). At age 61 Pearl Moody was in the protected class. Ms. Moody met the Army's legitimate performance expectations as evidenced by her absence of poor performance evaluations. Ms. Moody was adversely affected as she was unable to receive promotions and was subjected to the constant discrimination and discriminatory remarks to which her supervisor admitted. TR. 177. As for the fourth category, Ms. Moody was not replaced by anyone. However, this element seems unnecessary according to Justice Scalia in his opinion in *O'Connor*. *O'Connor*, supra, at 517 U.S. 308, 116 S. Ct. 1307, 134 L. Ed. 2d 433, (1996). In *O'Connor,* an employee was discharged after reorganization and brought an ADEA action against his former employer. The Fourth Circuit upheld the dismissal of plaintiff's claims for lack of establishing a prima facie case. That Court held that the plaintiff failed to show that he was replaced by someone outside the protected class. Justice Scalia wrote, "because it lacks probative value, the fact that an ADEA plaintiff was replaced by someone outside the

protected class is not a proper element of the *McDonnell Douglas* prima facie case." *O'Connor*, supra, at 317 U.S. 312.

The U. S. District Court for the Southern District of Ohio, in *Noble v. Brinker International, Inc.*, 175 F. Supp. 2d 1027 (S. D. Ohio 2001), grappled with the issue of what elements are necessary to establish a prima facie case. This district court did not use a stringent method to determine if a prima facie case had been established and ultimately declared that the plaintiff established a prima facie case. The fourth prong was passed based on the plaintiff's declaration that a co-worker, not in the protected class, was treated better than he was.

The fourth element in *Noble* appears to be irrelevant based on Justice Scalia's reasoning in. *O'Connor*, supra, at 317 U.S. 312. It is noteworthy that *O'Connor* was decided prior to *Noble*. Clearly it is time for this Honorable Court to expressly identify the elements necessary for a prima facie case of age discrimination.

The Seventh Circuit, in *Volovsek v. Wisconsin Department of Agriculture, Trade and Consumer Protection*, 344 F. 3d 680 (7th Cir. 2003), wrote through Circuit Judge Cudahy that the elements necessary to establish a prima facie case are: (1) she is a member of a protected class; (2) she met the employer's legitimate work expectations; (3) the employer took adverse employment action; and (4) the employer treated similarly situated employees outside the protected class more favorably. Again, the fourth element appears to be irrelevant as it changes from circuit to circuit. Even so, Pearl Moody established a prima facie case in the Seventh Circuit as her age clearly placed her within the protected class, she had an exceptional employment record, and she was denied promotions and subjected to constant

discriminatory acts by her supervisor. TR. 171-174, 177. As for the fourth element Pearl Moody has no problem establishing it, based primarily on her treatment by her supervisor and his constant denials of promotions. TR. 171-174, 177. Thus, Ms. Moody establishes her prima facie case according to the Seventh Circuit.

In Pearl Moody's case the Fifth Circuit has used a too restrictive version of the *McDonnell Douglas* framework. The various circuits have altered the *McDonnell Douglas* framework in order to fit what is thought to be appropriate in its particular circuit. Some circuits are more flexible than others and consider the circumstances of the individual cases to determine if a plaintiff has proven her prima facie case. The effect is a split within the circuits. The United States Supreme Court should settle the matter and provide clarity on what makes up the prima facie elements in a claim under the federal ADEA.

Justice Scalia has recognized that the Supreme Court has never actually decided if the *McDonnell Douglas* framework is the appropriate framework to be used in ADEA cases. In *O'Connor*, Justice Scalia, in addressing the proper prima facie elements to apply in an ADEA claim, stated, "we have never had occasion to decide whether that application of the Title VII rule to the ADEA context is correct...." *O'Connor*, supra, at 1310. The court abandoned the issue because the parties did not contest the point. It is now appropriate for this Court to address the issue.

II. Exhaustion requirement

The Fifth Circuit, in upholding the District Court's granting of respondent's motion for summary judgment, did not address the issue of whether Pearl Moody exhausted her

administrative remedies. It opined that Ms. Moody failed to make out a prima facie case. However, because the district court granted summary judgment for an alleged failure to exhaust administrative remedies and, due to the split in the circuits on this point, the petitioner is seeking clarity on this issue.

In *Bankston v. White*, 345 F.3d 768, 777 (9th Cir. 2003), the Ninth Circuit in a per curiam opinion held "the ADEA itself does not require Bankston to exhaust administrative remedies before filing suit...."

In *Stevens v. Department of the Treasury, et al.*, 500 U.S. 1, 6 111 S.Ct. 1562, 114 L. Ed. 2d 1 (1991), Justice Blackmun delivered the opinion for the majority, "a federal employee complaining of age discrimination, however, does not have to seek relief from his employing agency or the EEOC at all." Justice Blackmun recognized that, "...the exhaustion issue has divided the Circuits" and compared *Langford v. United States Army Corps of Engineers*, 839 F.2d 1192 (6th Cir. 1988), with *Purtill v. Harris*, 658 F. 2d 134 (3d Cir. 1981), cert. denied, 462 U.W. 1131, 103 S.Ct. 3110, 77 L.Ed.2d 1365 (1983). However, because of a procedural difficulty, the Supreme Court declined to rule on the merits of the exhaustion issue. Justice Stevens, in his opinion concurring in part and dissenting in part, would have decided the issue and wrote, "in my view, the Government is quite right in its present position that the statute contains no requirement that a federal employee exhaust administrative remedies before instituting a court action." The issue has resurfaced in Pearl Moody's case as the Fifth Circuit, in imparting an exhaustion requirement, goes counter to Justice Stevens' opinion.

The federal district court in *Rann v. Chao*, 2003 WL 22331896 (D.C. Cir. 2003) wrote that the District of

Columbia Circuit has held that the "timeliness and exhaustion requirements of § 633a(d) are subject to equitable defenses...." *Rann,* supra, at 2. Moreover, the district court asserted that "the ADEA is silent on whether a plaintiff who has started the administrative process by filing such a complaint must reasonably pursue the process, as an exhaustion requirement would ordinarily entail." The circuits are split on this point. Compare *Langford v. United States Army Corps of Engineers*, 839 F.2d 1192 (6th Cir. 1988) (finding no exhaustion necessary) and *Bak v. Postal Service*, 52 F.3d 241 at 243-244 (9th Cir. 1995) (finding no exhaustion necessary), with *Purtill v. Harris*, 658 F. 2d 134 at 138 (3d Cir. 1981) (finding need for exhaustion). The District of Columbia Circuit abstained from addressing the exhaustion issue based on the fact that the parties stipulated that there was an exhaustion requirement.

Consequently, due to the split among the circuits regarding the exhaustion requirements of an ADEA claim, the United States Supreme Court should grant this petition of writ of certiorari.

CONCLUSION

There are two issues of great import that should be addressed by the United States Supreme Court. Although the Fifth Circuit affirmed the federal district court's opinion to grant summary judgment in favor of the respondent, that decision was based on a failure to establish a prima facie case. The *McDonnell Douglas* structure has never been established by this Court as the appropriate structure to use in an ADEA claim. The various federal circuits are divided on this issue, in some cases reformulating the *McDonnell Douglas* framework. Moreover, some circuits have pursued a more flexible approach to the requirements to establish a

prima facie case. Because of the importance of the issue and the obvious confusion thereof, this Court should grant this writ in order to settle the matter.

The circuits are likewise split on whether there is an exhaustion requirement for ADEA claims. Because the ADEA does not explicitly state an exhaustion requirement, various circuits have imposed the necessity to exhaust administrative remedies while others have not. For the sake of consistency in the federal law this writ should be granted.

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